

IN THE DISTRICT COURT OF THE VIRGIN ISLANDS  
DIVISION OF ST. THOMAS AND ST. JOHN

ETHLYN LOUISE HALL, ETHLYN HALL as trustee of the ETHLYN LOUISE HALL FAMILY TRUST, and ELSA EMILY HALL,  Plaintiffs,  v.  SAMUEL HALL, Jr. and HALL & GRIFFITH, PC,  Defendants.	3:11-cv-00054  Action for Damages and for an Accounting  JURY TRIAL DEMANDED
SAMUEL HALL, Jr.,  Plaintiff,  v.  ELSA HALL,  Defendant.	Civil No. 3:13-CV-00095  Action for Damages and for an Accounting  JURY TRIAL DEMANDED

AFFIDAVIT OF SAMUEL HALL, JR.

I, SAMUEL HALL, being duly sworn depose and say:

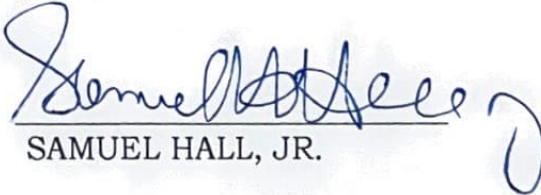
1. I am the defendant in the case captioned above that was brought by the Ethlyn Louise Family Trust (3:11-cv-00054). I am the Plaintiff in the case against Elsal Hall (3:13-cv-00095).
2. I am now 75 years old and have health challenges including a bout with cancer that is now in remission.
3. These actions presently pending before this Court are based on diversity of citizenship and involve the exclusive determination of rights under local law.

4. The civil actions have been pending before this Court since 2011 and 2013 respectively, and resulted in jury verdicts in my favor, and I would like the civil matters concluded by the Court while I am still capable of testifying on my own behalf and while I am able to aid in my defense against the claims allegedly outstanding against me, most if not all were resolved in my favor by jury verdicts. The remaining claims against me, I believe, were supposed to be dismissed by Judge Gomez before he left the bench but he apparently did not do so.

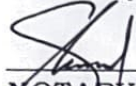
5. In an attempt to dispose of the remaining claims against me my counsel filed motions that are currently pending for (1) Summary Judgment disposing of Elsa Hall's Conversion Claim and for Removal of Lis Pendens (ECF 487, 499, 500, 501, 502, 503, 504) and (2) for Summary Judgment to dismiss her claim of Malpractice on my part (ECF 489, 490, 491). The issues related to these motions have been fully briefed and, when decided, should fully dispose of these claims in my opinion. Indeed, they may have already been disposed where the undersigned was found by a jury not to have committed fraud or breach of fiduciary duty as a lawyer or even as a non-lawyer. Those jury determinations were upheld by the Third Circuit Court of Appeals.

6. The Legislature of the Virgin Islands has amended 5 V.I.C. §31 to provide for trial preference for senior citizens ahead of those younger than 70 years old where elderly seniors are parties to a civil action. I, Samuel Hall, as a qualified senior, by this affidavit, petition this Court to conclude this case as expeditiously as possible. Even if the Court were not strictly bound by the

provisions of 5 V.I.C. §31, it is persuasive authority for promptly deciding the two civil actions and to bring this litigation to a close where the undersigned is currently 75 years old.

  
SAMUEL HALL, JR.

Subscribe and Sworn to  
Before me this 11<sup>th</sup> day  
Of Sept, 2023

  
NOTARY PUBLIC  
My Commission Expires  
10 / 29 / 2024

